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July 11, 2018

VIA ECF

District Judge Nina Gershon
Chief Magistrate Judge Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201



Re: Brown v. St. Kitts Marriott Resort and the Royal Beach Casino, et. al.
Case 1:14-cv-05960-SLT-RLM

Dear Judge Gershon and Judge Mann:

On behalf of the defendant MII, we seek permission to file a request for a pre-motion submission conference. We realize that through an oversight in our office, our request was due yesterday, July 10, 2018, and while we do not intend to treat our error lightly, we note there is no prejudice to the plaintiff by this late submission. We attach our proposed pre-motion submission for your consideration.

Thank you for considering our request.

Respectfully,

WADE CLARK MULCAHY LLP

/s/

Paul W. Vitale
PWV/dm